## **Exhibit C**

## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

WSOU INVESTMENTS, LLC D/B/A	§	CIVIL ACTION 6:20-cv-00533-ADA
BRAZOS LICENSING AND	§	CIVIL ACTION 6:20-cv-00534-ADA
DEVELOPMENT,	§	CIVIL ACTION 6:20-cv-00535-ADA
Plaintiff,	§	CIVIL ACTION 6:20-cv-00536-ADA
	§	CIVIL ACTION 6:20-cv-00537-ADA
	§	CIVIL ACTION 6:20-cv-00538-ADA
v.	§	CIVIL ACTION 6:20-cv-00539-ADA
	§	CIVIL ACTION 6:20-cv-00540-ADA
	§	CIVIL ACTION 6:20-cv-00541-ADA
HUAWEI TECHNOLOGIES CO.,	§	CIVIL ACTION 6:20-cv-00542-ADA
LTD. and HUAWEI	§	CIVIL ACTION 6:20-cv-00543-ADA
TECHNOLOGIES USA INC.,	§	CIVIL ACTION 6:20-cv-00544-ADA
Defendants.	§	

## [DRAFT] DISCOVERY ORDER

Following the *Markman* hearings, and pursuant to the Court's Order Governing Proceedings, the following discovery limits will apply to the twelve cases referenced above:

- <u>Interrogatories</u>: 8 common interrogatories per side (which can be used across all of the twelve cases above) and 12 case-specific interrogatories (which can be used only for that specific case);
- Requests for Admission: 10 common RFAs (which can be used across all of the twelve cases above) and 20 case-specific RFAs (which can be used only for that specific case);
- Requests for Production: 10 common RFPs (which can be used across all of the twelve cases above) and 35 case-specific RFPs (which can be used only for that specific case);
- <u>Fact (Party) Depositions</u>: 10 common hours per side (which can be used across all of the twelve cases above) and 21 case-specific hours (which can be used only for that specific case);
- <u>Fact (Third-Party) Depositions</u>: 21 case-specific hours (which can be used only for that specific case);

• Expert Depositions: 7 hours per expert/per report (unless the expert is opining in numerous cases, in which case expert depositions are limited to 7 hours per expert/per report for the first case, and 4 additional hours for each additional case in which the expert provides a report).